

**To:** Macdonald, Kathryn (ENRD)[Kathryn.Macdonald@usdoj.gov]  
**From:** Hoefer, David  
**Sent:** Wed 5/14/2014 9:47:17 PM  
**Subject:** WL  
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Letter responding to Koster's 4/29 letter. To be sent 5/15.

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From: Brooks, Karl  
Sent: Wednesday, May 14, 2014 5:17:49 PM  
To: Carey, Curtis; Tapia, Cecilia; Hammerschmidt, Ron; Hague, Mark; Hoefer, David  
Subject: Koster letter

Thank you for your letter of April 29, 2014, requesting EPA do additional off-site investigative work of what you term haul routes that may have transported radiological material to the West Lake Landfill. This agency appreciates the State's work with EPA to continue protecting public health and the environment.

EPA Region 7 plans to conduct a radiation screening program at the Bridgeton Municipal Athletic Complex (BMAC). This unusual step of reevaluating recent and historical data and testing reaffirms this agency's commitment to protect Missourians' public health and safety. I announced on May 9 EPA plans to mobilize the week of May 19.

This agency will send you and MDNR shortly public information about soil sampling already conducted along the haul routes from the Hazelwood Interim Storage Site to West Lake Landfill. The St. Louis U.S. Army Corps of Engineers FUSRAP 2005 Record of Decision for the North St. Louis County Sites identified the following as the sampled haul routes; Eva Avenue, Frost Avenue, Hazelwood Avenue, McDonnell Avenue, and Pershall Road. A total of 231 samples were collected and analyzed by the Corps and analyzed for Radium-226, Thorium-230, Thorium-232, and Uranium-238.

In addition to this extensive sampling effort, MDNR took 43 soil samples in 2005 in the ditches and shoulders along Boenker Lane and Taussig Road for radium, thorium and uranium. Sample results cited in both the Army ROD and MDNR's reports did not identify any high concentrations of these radionuclides

On April 25, EPA Region 7 received information from a local resident suggesting a potential radiation detection off-site at the Bridgeton Municipal Athletic Complex. This unverified information was stated to come from a drainage ditch, not from the BMAC ball fields or areas where facility users would reasonably be expected to come in contact for any appreciable period of time. The usefulness of this information is very limited due to the absence of quality assurance/quality control during the collection of the data.

As you know, the Missouri Department of Natural Resources conducted scientifically valid radiation dust sampling near the ball fields in 2013. The results of this testing show that the area tested was not contaminated with radiological material. The ball fields are located approximately one mile to the north east of West Lake. No evidence presented to EPA suggests that these areas were contaminated by radiological materials related to Manhattan Engineer District/Atomic Energy Commission (MED/AEC) uranium ore processing activities.

There has been no validated information made available to the state of Missouri or EPA indicating that any West Lake related radiological contamination has come to be located off-site. EPA has no information suggesting that site conditions do not remain protective of public health and the environment.

I agree with you that the health and safety of the community is a priority. However, the validated data described in this letter indicate no legal or scientific basis for the EPA to do more sampling pertaining to

what you describe as "haul routes" near the West Lake landfill. However, we are undertaking a screening of BMAC to allay public concerns at that heavily used recreation complex. The screening program EPA will use there has been employed at many sites across the country and is supported by documented procedures. Soil sampling will also be performed at BMAC to confirm the screening results.

Nor does this agency have authority to conduct activities under the FUSRAP program, such as repeating previous investigations by the Army and MDNR of the haul roads.

If you have any questions, please feel free to contact me.

Sincerely,